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U.S. District Court,  
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May 27, 2022  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GOVERNMENT EMPLOYEES INSURANCE  
COMPANY, GEICO INDEMNITY COMPANY,  
GEICO GENERAL INSURANCE COMPANY  
& GEICO CASUALTY COMPANY,

Plaintiffs,

v.

22cv2160

BOULEVARD 9229, LLC; ET AL.,

Defendants.

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**ANSWER OF DEFENDANT, PAVAN MANTRIPRAGADA**

Defendant, Pavan Mantripragada, answers the correspondingly numbered paragraphs of the Complaint of Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance & GEICO Casualty Company (collectively, the "Plaintiff") as follows:

1. Denied.
2. Without knowledge and, therefore, denied.
3. Denied.
4. Without knowledge and, therefore, denied.
5. Without knowledge and, therefore, denied.
6. Admitted that Pavan is the owner of record of Streamline, otherwise denied.
7. Denied.
8. Without knowledge and, therefore, denied.
9. Without knowledge and, therefore, denied.
10. Denied.
11. Admitted that Pavan Mantripragada is the owner of record of Streamline,

otherwise denied.

12. Denied.

13. Denied.

14. Denied.

**THE PARTIES**

15. Without knowledge and, therefore, denied.

16. Without knowledge and, therefore, denied.

17. Without knowledge and, therefore, denied.

18. Without knowledge and, therefore, denied.

19. Without knowledge and, therefore, denied.

20. Without knowledge and, therefore, denied.

21. Without knowledge and, therefore, denied.

22. Without knowledge and, therefore, denied.

23. Without knowledge and, therefore, denied.

24. Without knowledge and, therefore, denied.

25. Without knowledge and, therefore, denied.

26. Without knowledge and, therefore, denied.

27. Without knowledge and, therefore, denied.

28. Without knowledge and, therefore, denied.

29. Admitted.

30. Denied.

31. Admitted.

32. Without knowledge and, therefore, denied.

33. Without knowledge and, therefore, denied.

34. Without knowledge and, therefore, denied.

**JURISDICTION AND VENUE**

- 35. Admitted for jurisdiction purposes only.
- 36. Admitted for jurisdiction purposes only.
- 37. Admitted for jurisdiction purposes only.
- 38. Admitted for venue purposes only.

**ALLEGATIONS COMMON TO ALL CLAIMS**

- 39. Without knowledge and, therefore, denied.
- 40. Without knowledge and, therefore, denied.
- 41. Without knowledge and, therefore, denied.
- 42. Without knowledge and, therefore, denied.
- 43. Without knowledge and, therefore, denied.
- 44. Without knowledge and, therefore, denied.
- 45. Without knowledge and, therefore, denied.
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- 165. Without knowledge and, therefore, denied.
- 166. Without knowledge and, therefore, denied.
- 167. Without knowledge and, therefore, denied.
- 168. Without knowledge and, therefore, denied.
- 169. Without knowledge and, therefore, denied.
- 170. Denied.
- 171. Without knowledge and, therefore, denied.
- 172. Denied.
- 173. Denied.
- 174. Denied.
- 175. Denied.
- 176. Denied.
- 177. Denied.
- 178. Denied.
- 179. Denied.
- 180. Denied.
- 181. Without knowledge and, therefore, denied.
- 182. Without knowledge and, therefore, denied.



183. Without knowledge and, therefore, denied.
184. Without knowledge and, therefore, denied.
185. Without knowledge and, therefore, denied.
186. Without knowledge and, therefore, denied.
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- 215. Without knowledge and, therefore, denied.
- 216. Without knowledge and, therefore, denied.
- 217. Denied.
- 218. Without knowledge and, therefore, denied.
- 219. Without knowledge and, therefore, denied.
- 220. Without knowledge and, therefore, denied.
- 221. Denied.
- 222. Denied.
- 223. Denied.
- 224. Denied.
- 225. Without knowledge and, therefore, denied.
- 226. Without knowledge and, therefore, denied.
- 227. Without knowledge and, therefore, denied.
- 228. Denied.
- 229. Denied.
- 230. Denied.
- 231. Denied.
- 232. Denied.

233. Without knowledge and, therefore, denied.

234. Denied.

235. Denied.

236. Denied.

237. Denied.

238. Denied.

239. Denied.

240. Denied.

241. Denied.

242. Denied.

243. Without knowledge and, therefore, denied.

244. Without knowledge and, therefore, denied.

245. Without knowledge and, therefore, denied.

**FIRST CLAIM FOR RELIEF**

246. Denied.

247. Denied.

248. Denied.

249. Denied.

250. Denied.

251. Denied.

252. Denied.

253. Denied.

254. Denied.

**SECOND CLAIM FOR RELIEF**

255. Denied.

256. Denied.

257. Denied.

258. Denied.

259. Denied.

260. Denied.

261. Denied.

### **THIRD CLAIM FOR RELIEF**

262. Denied.

263. Denied.

264. Denied.

265. Denied.

266. Denied.

267. Denied.

### **FOURTH CLAIM FOR RELIEF**

268. Without knowledge and, therefore, denied.

269. Without knowledge and, therefore, denied.

270. Without knowledge and, therefore, denied.

271. Without knowledge and, therefore, denied.

272. Without knowledge and, therefore, denied.

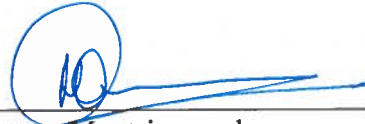
273. Without knowledge and, therefore, denied.

274. Without knowledge and, therefore, denied.

275. Without knowledge and, therefore, denied.

276. Without knowledge and, therefore, denied.

Pavan Mantripragada reserves the right to amend this Answer and to assert any applicable legal defenses once he has representation by counsel of record in this action.



Pavan Mantripragada  
14300 Eagle Pointe Drive  
Clearwater, FL 33762  
pavan.mantripragada@gmail.com  
813/390-7372

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2022, I served the foregoing upon all parties of record.



Pavan Mantripragada